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Attorneys for Plaintiffs  
RICHARD WADE and SAVANNAH CHAMPION

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

RICHARD WADE and SAVANNAH  
CHAMPION,

Plaintiffs,

v.

CITY OF VACAVILLE, JOHN CARLI,  
STEVEN GUNDERSON, RALPH  
VALLIMONT, CHRIS LECHUGA, JEREMY  
JOHNSON, WILLIAM BOEHM, TREVOR  
CHAMPION, SABRINA CHAMPION,  
JACKIE CHAMPION, and DOES 1 to 100,  
inclusive,

Defendants.

Case No. 2:20-CV-01965-TLN-KJN

**STIPULATION AND ORDER TO EXTEND TIME  
TO RESPOND TO COMPLAINT**

**Hon. Troy L. Nunley**

1 Plaintiffs RICHARD WADE and SAVANNAH CHAMPION and defendant CITY OF  
2 VACAVILLE, by and through their counsel of record, hereby represent to the Court as follows:

3 WHEREAS, on September 30, 2020 Plaintiffs filed their Complaint in the above captioned  
4 action;

5 WHEREAS, on December 14, 2020, defendant CITY OF VACAVILLE was served with the  
6 Complaint;

7 WHEREAS, defendant CITY OF VACAVILLE's responsive pleading is due on January 4, 2021;

8 WHEREAS, counsel for the parties intend to meet and confer regarding the Complaint to discuss  
9 the claims being brought and whether an amended complaint should be filed to avoid unnecessary motion  
10 practice;

11 WHEREAS, counsel for defendant CITY OF VACAVILLE is seeking authorization to accept  
12 service on behalf of all CITY OF VACAVILLE officers also sued in this matter, but whom have not yet  
13 been personally served;

14 WHEREAS on December 30, 2020, the parties stipulated to continue defendant CITY OF  
15 VACAVILLE's responsive pleading deadline by 15 days to January 19, 2021;

16 WHEREAS on December 30, 2020, the parties also stipulated that any other CITY OF  
17 VACAVILLE employees who are defendants in this case and for whom service has been accomplished  
18 prior to January 19, 2021, either by personal service or by service being accepted by counsel for the  
19 CITY OF VACAVILLE, shall also file any responsive pleading by January 19, 2021;

20 IT IS HEREBY STIPULATED, pursuant to Local Rule 144(a), that: (1) defendant CITY OF  
21 VACAVILLE's deadline to respond to the Complaint shall be extended to January 19, 2021; and (2) any  
22 defendants who are employees of the CITY OF VACAVILLE and who have either been personally  
23 served or for whom service has been accepted prior to January 19, 2021 also will file their responsive  
24 pleading by January 19, 2021.

25 //

26 //

27 //

28 //

1 It is so stipulated and agreed.

2  
3 Dated: December 30, 2020

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

4  
5 By: /s/ Richard W. Osman

Richard W. Osman

6 Sheila D. Crawford

Attorneys for Defendants

7 CITY OF VACAVILLE, JOHN CARLI, STEVEN

8 GUNDERSON, RALPH VALLIMONT, CHRIS

LECHUGA, JEREMY JOHNSON, and WILLIAM

BOEHM

9  
10 Dated: December 30, 2020

LAW OFFICE OF FRANK PACHECO

11  
12 By: /s/ Frank M. Pacheco

Frank M. Pacheco

13 Attorneys for Plaintiffs

14 RICHARD WADE and SAVANNAH CHAMPION

15 **ATTORNEY ATTESTATION**

16 I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
17 conformed signature (“/s/”) within this E-filed document or have been authorized by Plaintiffs’ counsel  
18 to show their signature on this document as /s/.

19 Dated: December 30, 2020

20 By: /s/ Richard Osman

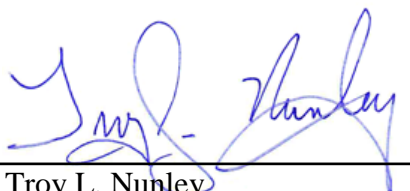
Richard W. Osman

21  
22 **ORDER**

23 GOOD CAUSE APPEARING THEREFORE, and the parties’ having stipulated to the same, the  
24 parties’ stipulation is hereby APPROVED.

25 **IT IS SO ORDERED.**

26  
27 DATED: December 30, 2020

28   
Troy L. Nunley

United States District Judge